United States District Court
Eastern District Of Missouri
St Louis Division

Lucas Sebastian Gunatilleke Case no: 4:2024cv01635

Plaintiff,

Vs

Griffin Menne, Lawrence Himemiya

Defendants.

COMPLAINT

Plaintiff, Lucas Sebastian Gunatilleke, appearing pro se, sues defendants Griffin Menne and Lawrence Himemiya and further alleges the following:

JURISDICTION AND VENUE ALLEGATIONS

1. This is an action in excess of $75,000.00.
2. Plaintiff Lucas Sebastian Gunatilleke is a citizen and resident of The United Kingdom.
3. Defendant Griffin Menne is a citizen and resident of the state of Missouri.
4. Defendant Lawrence Himemiya is a citizen and resident of the state of New York.
5. Subject matter jurisdiction exists pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship.

GENERAL ALLEGATIONS

6. On or about December 22, 2023, Defendant Griffin Menne, disseminated the Plaintiff's personal information onto an online forum. Defendant Menne made posts detailing the Plaintiff's full name, date of birth, home address, the full name of the Plaintiff's mother, the full name of the Plaintiff's father and the telephone number of the Plaintiff's mother.
7. Defendant Menne made further posts, containing false and libelous claims, accusing the Plaintiff of giving substantial amounts of money, and other forms of support, to a man Defendant Menne claimed was a pedophile.
8. Plaintiff had never given any amount of money to the man in question, nor any other form of support.
9. There is no evidence, that the court will find sufficient, to justify Defendant Menne's claim that the man in question is a pedophile.
10. Subsequently, on or about July 30, 2024, Defendant Lawrence Himemiya wrote and published an online article where she named Plaintiff by his full legal name and then composed a series of false and libelous claims, accusing the Plaintiff of enabling pedophilia and alledging that Plaintiff was involved in financial fraud.
11. Defendant Himemiya is a transgender and appears to go by numerous different names. This had made it difficult for Plaintiff to identify their legitimate legal name.

COUNT I - HARASSMENT

12. Plaintiff incorporates and sets forth all preceding paragraphs as though fully set forth herein.

13. Defendant Griffin Menne violated Missouri Revised Statute § 575.120 because he disseminated Plaintiff's personal information onto the internet with the intent to harass and cause emotional harm.

14. Subsequently, Plaintiff's family received threatening phone calls from third parties who had seen Menne's posts regarding Plaintiff.

COUNT II - DEFAMATION (LIBEL)

15. Plaintiff incorporates and sets forth all preceding paragraphs as though fully set forth herein.

16. Defendant Lawrence Himemiya wrote and published an online article in which she identified Plaintiff by his full legal name.

17. In this article, Defendant Himemiya made false, defamatory, and libelous statements concerning Plaintiff, including but not limited to:

    a. Accusing Plaintiff of enabling pedophilia,

    b. Alleging that Plaintiff was involved in financial fraud.

18. These statements were false, as Plaintiff has never engaged in or supported pedophilia in any capacity, nor has Plaintiff participated in any financial fraud.

19. Defendant Himemiya published these false statements to third parties via an online website, ensuring their widespread dissemination.
20. Defendant Himemiya acted with actual malice or, at a minimum, with reckless disregard for the truth, as she failed to verify the accuracy of her statements before publishing them.
21. As a direct and proximate result of Defendant Himemiya's false and defamatory statements, Plaintiff has suffered severe reputational harm and emotional distress.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the court award $50,000.00 in actual damages against Defendant Menne, for the emotional distress his harassment caused to the Plaintiff and $150,000.00 in actual damages against Defendant Himemiya, for the reputational harm and emotional distress the Plaintiff suffered as a result of their defamatory and libelous allegations.

REQUEST FOR JURY TRIAL

Plaintiff requests trial by jury on all matters so triable.

I declare under penalty of perjury that the foregoing is true and correct

Respectfully submitted,

Lucas Sebastian lucas

Dated 01/29/2025